

Message

---

**From:** Ayres, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CE5147A6A41E4AD488630393BB12C3F0-AYRES, SARA]  
**Sent:** 8/13/2018 10:52:27 PM  
**To:** Bartlett, Keith [Bartlett.Keith@epa.gov]  
**CC:** Mia, Marcia [mia.marcia@epa.gov]  
**Subject:** RE: Tiering for OIAI

Keith,

Have you heard any more about the OIAI tiering request? We briefed it all the way up through Larry and everyone supports the up-tier, but I didn't know if OAQPS gave you any response? At my last workgroup meeting they seemed to be expecting to schedule Options Selection. Thanks.

Sara Ayres  
Air Branch  
USEPA / OECA / OC / MAMPD  
[ayres.sara@epa.gov](mailto:ayres.sara@epa.gov)  
(312) 353-6266

---

**From:** Bartlett, Keith  
**Sent:** Tuesday, August 7, 2018 8:24 AM  
**To:** Lischinsky, Robert <[Lischinsky.Robert@epa.gov](mailto:Lischinsky.Robert@epa.gov)>; Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>  
**Cc:** Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>; Duffy, Rick <[Duffy.Rick@epa.gov](mailto:Duffy.Rick@epa.gov)>  
**Subject:** RE: Tiering for OIAI

Rob, I would encourage you to share this information with OC management today via email. No time to wait for MAMPD General.

Keith

---

**From:** Lischinsky, Robert  
**Sent:** Monday, August 06, 2018 3:31 PM  
**To:** Bartlett, Keith <[Bartlett.Keith@epa.gov](mailto:Bartlett.Keith@epa.gov)>; Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>  
**Cc:** Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>; Duffy, Rick <[Duffy.Rick@epa.gov](mailto:Duffy.Rick@epa.gov)>  
**Subject:** RE: Tiering for OIAI

Thanks for the update Keith. We can raise with John Dombrowski (temporarily serving as acting OD) on Wednesday at our scheduled weekly.

Rob

---

**From:** Bartlett, Keith  
**Sent:** Monday, August 06, 2018 3:16 PM  
**To:** Lischinsky, Robert <[Lischinsky.Robert@epa.gov](mailto:Lischinsky.Robert@epa.gov)>; Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>  
**Cc:** Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>; Duffy, Rick <[Duffy.Rick@epa.gov](mailto:Duffy.Rick@epa.gov)>  
**Subject:** RE: Tiering for OIAI

Rob,

Based on a phone call I just received, I would recommend that David share this news "Uptier request" with OECA AA, in light of the fact that OP Career Staff will be sharing this information with the Brittany Bolen, OP AA tomorrow. OP staff supports the Uptier Request and they feel that having OECA AA support would help OECA uptier request. I told OP that Susan was out of town and most likely would not get this information from her before their update to OP AA.

Thank you –

Keith

---

**From:** Lischinsky, Robert  
**Sent:** Friday, July 20, 2018 5:01 PM  
**To:** Bartlett, Keith <[Bartlett.Keith@epa.gov](mailto:Bartlett.Keith@epa.gov)>; Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>  
**Subject:** RE: Tiering for OIAI

Keith,

Sorry not to get back to you earlier. I am actually not working today but have been checking e-mails. I will raise with Martha Monday morning. Sara has already prepared a draft justification that can be shared with her. We will see what Martha says but I assume she will want to bring this to David. Maybe we can do so before the Weekly.

Rob

---

**From:** Bartlett, Keith  
**Sent:** Friday, July 20, 2018 11:49 AM  
**To:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>  
**Cc:** Lischinsky, Robert <[Lischinsky.Robert@epa.gov](mailto:Lischinsky.Robert@epa.gov)>  
**Subject:** RE: Tiering for OIAI

Rob, is there a way to do this more expeditiously instead of waiting for MAMPD weekly meetings with David?

---

**From:** Ayres, Sara  
**Sent:** Wednesday, July 11, 2018 9:13 AM  
**To:** Bartlett, Keith <[Bartlett.Keith@epa.gov](mailto:Bartlett.Keith@epa.gov)>  
**Cc:** Lischinsky, Robert <[Lischinsky.Robert@epa.gov](mailto:Lischinsky.Robert@epa.gov)>  
**Subject:** RE: Tiering for OIAI

I asked the WG chair why it was Tier 3 during a separate discussion sometime last week and they said sort of the same thing you provided, that it was based on the original action's Tier. I told them my management was wondering why it was Tier 3, but I didn't say we were considering asking for an uptier. I certainly didn't say our concerns were "on hold" as a result of the discussion. However, my management hasn't made a decision yet on if they want to ask for an uptier, they want to know what the process for such a request would entail – who needs to sign what and what kinds of justification do we need for such a request.

Sara Ayres  
Air Branch  
USEPA / OECA / OC / MAMPD  
[ayres.sara@epa.gov](mailto:ayres.sara@epa.gov)  
(312) 353-6266

---

**From:** Bartlett, Keith  
**Sent:** Wednesday, July 11, 2018 8:06 AM

**To:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>

**Subject:** FW: Tiering for OIAI

Sara, is this accurate? I reached out to OAR Regulatory Steering Committee reps and this was their response. I am not sure why they would have WG Chair reach out to you instead of responding to me, but, this is the world we are living in.

Thanks –

Keith

---

**From:** Rush, Alan

**Sent:** Tuesday, July 10, 2018 4:44 PM

**To:** Bartlett, Keith <[Bartlett.Keith@epa.gov](mailto:Bartlett.Keith@epa.gov)>; Farrar, Wanda <[farrar.wanda@epa.gov](mailto:farrar.wanda@epa.gov)>

**Cc:** Henigin, Mary <[Henigin.Mary@epa.gov](mailto:Henigin.Mary@epa.gov)>

**Subject:** RE: Tiering for OIAI

Keith and Wanda,

I have been told that the WG Chair called and talked to the WG member about this action and our 'rationale'. My understanding is that OECA's 'concerns' are on hold for the moment and that we will revisit tiering in the next month after further management discussions. I'm not privy to the conversations, but after you confer with your WG member, if my characterization is not correct, I will make some more noise about it and see if I can get you an answer.

Alan

---

**From:** Bartlett, Keith

**Sent:** Tuesday, July 10, 2018 9:52 AM

**To:** Farrar, Wanda <[farrar.wanda@epa.gov](mailto:farrar.wanda@epa.gov)>

**Cc:** Rush, Alan <[Rush.Alan@epa.gov](mailto:Rush.Alan@epa.gov)>

**Subject:** RE: Tiering for OIAI

4908

---

**From:** Farrar, Wanda

**Sent:** Tuesday, July 10, 2018 8:42 AM

**To:** Bartlett, Keith <[Bartlett.Keith@epa.gov](mailto:Bartlett.Keith@epa.gov)>

**Cc:** Rush, Alan <[Rush.Alan@epa.gov](mailto:Rush.Alan@epa.gov)>

**Subject:** Re: Tiering for OIAI

Please send the SAN when you have a moment. Thanks.

---

**From:** Bartlett, Keith

**Sent:** Monday, July 9, 2018 3:59 PM

**To:** Farrar, Wanda; Rush, Alan

**Subject:** Tiering for OIAI

Hello, OAR RSC Reps: Please see below – Why is OAR using a Tiering approval from 2004 for this new policy direction and decision? Also, what was the documented justification to tier this rulemaking as a Tier 3 rule? OECA has concerns.

Thank you and happy to chat about this –

Keith

## **Tiering**

**Tier Status:** Approved – By Whom? And when?

**Tier Approval Date:** 10/1/2004

**Tier Level:** 3

## **Regulatory Reporting**

**Reg Agenda?:** Yes

Keith Bartlett  
Policy and Legislative Coordination Division  
Office of Administration and Policy  
Office of Enforcement and Compliance Assurance  
U.S. EPA  
202-564-2385